

January 18, 2015

Via ECF

The Honorable Allison D. Burroughs
1 Courthouse Way
Courtroom
Boston, MA 02110

Re: Ciolino v. Eastman et. al.
Docket No. 1:13-CV-13300

Dear Judge Burroughs,

I have received the Court's instructions and remarks sent on January 15, 2016. After review of the materials, I respectfully suggest one change to the Court's opening remarks to the jury.

At the bottom of the first page, the sentence reads, "[v]ery briefly, the Plaintiffs contend that the officers, without provocation, grabbed Mr. Ciolino and threw him to the ground and that this caused him injury." (Opening Remarks to Jury- Empanelment, p.1).

I respectfully suggest that the following language should be substituted: [v]ery briefly, the Plaintiffs contend that the officers, without provocation, arrested Mr. Ciolino and in executing his arrest, the officers used excessive force, which caused him injury."

Thank you.

Very truly yours,



Robert S. Sinsheimer

Cc: Stephen Pfaff
Client